

PATENT
Atty. Dkt No. WEAT0313

IN THE DRAWINGS:

The drawings are objected to under 37 CFR 1.83(a) as not showing the pump is located above the cooling zone.

Figure 3 shows a pump placed above a cooling zone (82). Paragraph [0028] discusses that bubbles first form at zone 82, and these bubbles cool the oil. Thus, zone 82 is a cooling zone. Because the pump is placed above cooling zone 82 in Figure 3, the drawing is proper per 27 CFR 1.83(a). Withdrawal of the objection is respectfully requested.

PATENT
Atty. Dkt. No. WEAT/0313

REMARKS

This is intended as a full and complete response to the Final Office Action dated June 24, 2004, having a shortened statutory period for response set to expire on September 24, 2005.

Claims 1-29 remain pending in the application and are shown above. Claims 10-17 and 27 are indicated to be allowable by the Examiner. Please reconsider the claims pending in the application for reasons discussed below.

In the specification, the paragraph [0027] has been amended to correct minor editorial problems.

The drawings are objected to under 37 CFR 1.83(a) as not showing the pump is located above the cooling zone.

Figure 3 shows a pump placed above a cooling zone (82). Paragraph [0028] discusses that bubbles first form at zone 82, and these bubbles cool the oil. Thus, zone 82 is a cooling zone. Because the pump is placed above cooling zone 82 in Figure 3, the drawing is proper per 27 CFR 1.83(a). Withdrawal of the objection is respectfully requested.

Claims 28-29 stand rejected under 35 USC § 102(b) as being anticipated by *Kisman* 6,039,121.

Kisman discloses an apparatus for production of hydrocarbons. The wellbore is divided into three co-extensive passageways. Production fluid rises up the first conduit and the cooled fluid is artificially lifted by a pump up the second conduit. *Kisman* does not teach, show, or suggest placing a pump within a cooling zone, as recited in claim 28. Withdrawal of the rejection is respectfully requested.

Claims 1-6, 18-23 and 25-26 stand rejected under 35 USC § 103(a) as being unpatentable over *Kisman* '121 in view of *Norris*, et al, '691.

PATENT
Atty. Dkt. No. WEAT/0313

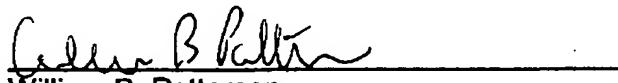
As discussed above, *Kisman* separates the fluid flow into two conduits. *Norris* discloses a controller for a downhole pump. The references, neither alone nor in combination, teach, show, or suggest the pump is positioned above the cooling zone in that portion of the fluid that is cooled in the wellbore, as recited in claim 1. Also, the references, neither alone nor in combination, teach, show, or suggest the pump is positioned above the cooling zone, as recited in claim 18. Withdrawal of the rejection is respectfully requested.

Claims 7-9 and 24 stand rejected under 35 USC § 103(a) as being unpatentable over *Kisman* '121 in view of *Norris*, et al, '691 as applied to claim 6 further in view of *Bownes* et al. (5,549,160).

Claims 7-9 depend from claim 1, and claim 24 depend from claim 18. As discussed above Applicant believes claims 1 and 24 are in condition for allowance. Therefore, Applicant also believes claims 7-9 and 24 are in condition for allowance.

Having addressed all issues set out in the Final Office Action, Applicant respectfully submits that the claims are in condition for allowance and respectfully requests that the claims be allowed.

Respectfully submitted,



William B. Patterson
Registration No. 34,102
MOSER, PATTERSON & SHERIDAN, L.L.P.
3040 Post Oak Blvd. Suite 1500
Houston, TX 77056
Telephone: (713) 623-4844
Facsimile: (713) 623-4846
Attorney for Applicant(s)

Page 10

380764_1